

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

CLAUDIA M. MORA, et al.	:	
	:	
Plaintiffs/Counterclaim Defendants,	:	Civil Action No.: 8:16-cv-00960-PX
v.	:	
	:	
LANCET INDEMNITY RISK RETENTION	:	
GROUP, INC., et al.	:	
	:	
Defendants/Counterclaim Plaintiffs.	:	

**DEFENDANT/COUNTERCLAIM PLAINTIFF LANCET INDEMNITY RISK
RETENTION GROUP, INC.'S CROSS MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 105.2(c), defendant/counterclaim plaintiff Lancet Indemnity Risk Retention Group, Inc. cross moves for summary judgment on its counterclaim seeking a declaration that Lancet is not obligated to provide coverage under the medical professional liability insurance policy bearing policy number LI201402002735, including but not limited to Plaintiffs' claims asserted in the action captioned *More et al. v. Ishtiaq Malik, M.D., P.C. et al.*, Case No. 407276-V (Circuit Court for Montgomery County, Maryland) and that the medical professional liability insurance policy bearing policy number LI201402002735 is void for lack of cooperation. The factual and legal bases for this cross motion are set forth in the supporting memorandum, which is incorporated herein by reference.

Dated: September 9, 2016

COZEN O'CONNOR, P.C.

/s/ Chad E. Kurtz
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*Attorneys for Defendant/Counterclaim Plaintiff,
Lancet Indemnity Risk Retention Group, Inc.*

CERTIFICATE OF SERVICE

I, Chad E. Kurtz, hereby certify that a copy of the foregoing Lancet's Cross Motion for Summary Judgment, along with the accompanying memorandum, proposed order, exhibit index, exhibits, and response to statement of undisputed material facts, were served this 9th day of September 2016 (i) via ECF, on the following counsel of record:

Matthew P. Maloney, Esq.
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*Attorney for Richard Akoto, M.D. and
Richard Osei Akoto, M.D., P.C., LLC*

and (ii) via U.S. First Class Mail, on the following parties:

Advanced Walk-In Urgent Care, LLC
c/o Ishtiak Malik, MD
37 Civic Centre
Shop #2, Phase 4
Bahria Town, Islamabad, Pakistan

Union Multi-Care Medical Center, Inc.
c/o Ishtiak Malik, MD
37 Civic Centre
Shop #2, Phase 4
Bahria Town, Islamabad, Pakistan

/s/ Chad E. Kurtz

Chad E. Kurtz